

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 19-CR-10081
	)	
DONNA HEINEL, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**DEFENDANTS' ASSENTED-TO MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendants respectfully move, with the assent of the government, for leave to file under seal the Exhibits to Defendants' Opposition to the government's Motion *in Limine* (Dkt. No. 841) to Preclude Irrelevant Evidence Concerning Uncharged Third Parties. Because the exhibits identify uncharged third parties and the children of Singer's clients, the defense seeks leave to file the exhibits under seal in accordance with the May 2, 2019 Protective Order and Local Rule 7.2. See Dkt. 165 at 3. Defendants will file a redacted version of the exhibits on the public docket.

Dated: October 19, 2021

Respectfully submitted,

/s/ Nina Marino  
NINA MARINO  
JENNIFER LIESER  
KAPLAN MARINO, P.C.  
1546 N. Fairfax Avenue  
Los Angeles, CA 90046  
Telephone: (310) 557-0007  
marino@kaplanmarino.com  
lieser@kaplanmarino.com  
(Admitted *pro hac vice*)  
Counsel for Dr. Donna Heinel

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-participants on October 19, 2021.

/s/ Jennifer Lieser  
JENNIFER LIESER  
Counsel for Dr. Donna Heinel